

Attachment 1
to
CABLE & WIRELESS GLOBAL
NETWORK LIMITED (IRELAND)
Application for Authority to Provide International Facilities-Based and Resold Services
to All International Points Except Cuba

Cable & Wireless Global Network Limited (Ireland) (“Applicant”), pursuant to Section 214 of the Communications Act of 1934, as amended (47 U.S.C. § 214), and Section 63.18 of the Commission’s rules (47 C.F.R. § 63.18), hereby applies for global authority to (1) operate as a facilities-based carrier pursuant to the terms and conditions of Section 63.18 (e)(1) of the Commission's Rules, 47 C.F.R. § 63.18 (e)(1), to provide international services to all foreign points as authorized by the Commission and (2) operate as a resale carrier pursuant to the terms and conditions of Section 63.18 (e)(2) of the Commission's Rules to resell and provide the international services of authorized United States common carriers to all foreign points as authorized by the Commission. 47 C.F.R. § 63.18 (e)(2). The services sought to be provided by Applicant include international private lines interconnected with the public switched network to the extent permitted by Section 63.16 of the Commission’s rules, 47 C.F.R. §63.16, for the provision of international basic switched, private line, data, television, and business services to all international points.

As explained below, the Applicant currently holds five international authorizations under Section 214. By this application, the Applicant seeks to consolidate such authority in a single global authorization. Grant of this application will serve the public interest, convenience and necessity by the administrative and regulatory efficiencies such consolidation will bring and by promoting competition in the international services market. Competition will benefit U.S.

consumers by increasing service options and lowering prices. Thus, the public interest will be served by the grant of Section 214 authority to the Applicant.

Pursuant to Section 63.18, the following information is submitted in support of this application:

- (a) The name, address and telephone number of the Applicant is:

Cable & Wireless Global Network Limited (Ireland)
6 Fitzwilliam Square, Dublin 2, Ireland
Tel: 44-207-315-4000

- (b) The Applicant is a corporation organized under the laws of Ireland.

- (c) Correspondence concerning this application should be addressed to:

Cable & Wireless Global Network Limited (Ireland)
6 Fitzwilliam Square, Dublin 2, Ireland
Tel: 44-207-315-4000

with copies of all correspondence to:

Richard Rubin, Esq.
Thelen Reid & Priest
701 Pennsylvania Avenue NW
8th Floor
Washington, DC 20004-2608
Tel: 202-508-4307
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and

Virginia Porter, Esq.
Cable & Wireless Americas Operations, Inc.
230 Park Avenue, Suite 1000,
New York, New York 10169
Tel: 212-551-3564
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(d) The Applicant currently holds the following five (5) international Section 214 authorizations, each of which it intends to surrender for cancellation upon grant of the instant application: (i) ITC-214-199990412-00223; (ii) ITC-214-199990412-00224; (iii) ITC-214-199990412-00227; (iv) ITC-214-199990412-00229; and (v) ITC-214-19980706-00453. Otherwise, Applicant has not previously sought authority pursuant to Section 214 of the Communications Act of 1934, as amended.

(e) The Applicant is herein requesting authority under Section 214 of the Communications Act of 1934, as amended, to operate as a facilities-based and resale international carrier pursuant to the terms and conditions of Sections 63.18(e)(1) and (2), 63.21, and 63.23 of the Commission's rules, as well as any and all other rules and regulations of the Commission applicable thereto. The Applicant is herein requesting authority to provide facilities-based international services and to resell the international services of common carriers authorized by the Commission, including international private lines interconnected with the public switched network to the extent permitted by the Commission's rules, for the provision of international basic switched, private line, data, television, and business services to all international points pursuant to Sections 63.16, 63.18(e)(1) and (2), 63.21, and 63.23 of the Commission's rules, as well as any and all other rules and regulations of the Commission applicable thereto.

(f) Not Applicable.

(g) The Applicant will continue to use previously authorized facilities to provide its facilities-based services and, thus, this Application is categorically excluded from environmental assessment pursuant to Section 1.1306 of the Commission's rules..

(h) For ownership and interlocking director information, please refer to Attachment 2.

(i) The Applicant certifies that it is affiliated with the foreign carriers listed by name and destination country in Exhibit A hereto.

(j) The Applicant certifies that it (1) it is not a foreign carrier and (2) does not control a foreign carrier in any destination country in which it seeks to provide international telecommunications services. The Applicant further certifies that it seeks to provide international telecommunications services to certain destination countries in which (3) an entity that owns more than 25 percent of the Applicant or that controls the Applicant, controls a foreign carrier, or (4) two or more foreign carriers (or parties that control foreign carriers) own, in the aggregate, more than 25 percent of the Applicant and are parties to, or beneficiaries of, a contractual relation affecting the provision or marketing of international telecommunications services in the United States. The foreign carriers and destination countries that are the subject of such affiliation are identified in Exhibit A hereto.

(k) Each destination country listed in response to paragraph (j), is a member of the WTO.

(l) On routes involving destinations where Applicant is affiliated with a foreign carrier and is classified as dominant (see Exhibit B hereto) and proposes to resell the international switched services of an unaffiliated U.S. carrier for the purpose of providing international telecommunications services to those destinations, the Applicant will file the requisite quarterly traffic reports for traffic on those routes, as required by Section 43.61(c) of the Commission's rules, 47 C.F.R. §43.61(c). In all other cases, the Applicant controls carriers that control far less than 50 percent of the relevant international transport and local access markets in the destination foreign countries and the Applicant, therefore, qualifies for a

presumption of non-dominance on those routes under Section 63.10(a)(3) of the Commission's rules (47 C.F.R. §63.10(a)(3)).

(m) The Applicant is entitled to non-dominant classification on all routes other than those identified in Exhibit B hereto as requiring dominant status. In all other cases, the Applicant controls carriers that control far less than 50 percent of the relevant international transport and local access markets in the destination foreign countries. The Applicant, therefore, qualifies for a presumption of non-dominance on these routes under Section 63.10(a)(3) of the Commission's rules (47 C.F.R. §63.10(a)(3)).

(n) The Applicant certifies that it has not agreed and will not agree in the future to accept any direct or indirect special concessions from any foreign carrier with respect to any United States international route where any such foreign carrier possesses market power on the foreign end of the route to affect competition adversely in the U.S. market.

(o) The Applicant certifies, pursuant to Sections 1.2001 through 1.2003 of the Commission's rules (47 C.F.R. §§ 1.2001-1.2003), that no party to this application is subject to a denial of Federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988 (21 U.S.C. § 853a).

(p) The Applicant desires streamlined processing of this application pursuant to Section 63.12 of the Commission's rules. Streamlined processing is appropriate for this Application under Section 63.12 of the Commission's rules because, for every country for which authority is requested in this Application, either the Applicant (1) has no foreign affiliate; (2) has a foreign affiliate but the country is a member of the WTO and the FCC has already determined that the foreign affiliate lacks market power; (3) has a foreign affiliate but the Applicant qualifies

for a presumption of non-dominant treatment under Section 63.10(a)(3); or (4) has agreed to accept dominant carrier status. Thus, the Application is eligible for such streamlined processing because none of the exceptions which would disqualify the Applicant from eligibility as set forth in Section 63.12(c) of the Commission's rules are applicable.

(q) With specific regard to Applicant's request for authorization to use international simple resale ("ISR"), Applicant hereby certifies that the destination countries to which Applicant's request pertains are those that are currently listed on the Commission's list of countries for which ISR is already authorized (see <http://ftp.fcc.gov/ib/isr.html>).

In conclusion, the Applicant certifies that all of the information in this application is complete and correct. In view of the information contained herein, the Applicant respectfully submits that it is legally, technically, and financially qualified to provide international resale services and that grant of this application will serve the present and future public interest, convenience and necessity. Accordingly, the Applicant requests that the Commission act expeditiously and favorably on this application.

Exhibit A – List of Foreign Affiliated Carriers

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
Cable and Wireless (West Indies) Limited (“C&W (WI) Ltd”) (Cable and Wireless plc ultimately owns 100%)	Anguilla	Yes
Cable and Wireless (West Indies) Limited (Cable and Wireless plc ultimately owns 100%) Cable and Wireless Caribbean Cellular (Antigua) Limited (Cable and Wireless plc ultimately owns 100%)	Antigua and Barbuda	Yes
Branch of Cable and Wireless plc	Ascension Island	Yes
Cable & Wireless (Barbados) Limited (C&W (WI) Ltd owns approximately 81%, which is ultimately 100% owned by Cable and Wireless plc)	Barbados	Yes
Cable & Wireless (Belgium) S.A. (Cable and Wireless plc ultimately owns 100%)	Belgium	Yes

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
<p>Cable and Wireless Bermuda Ltd. (Cable and Wireless plc ultimately owns 100%)</p> <p>Quantam Communications Ltd (Cable & Wireless (CALA) Investments owns 40%, which is 100% owned by C&W (WI) Ltd, which is ultimately 100% owned by Cable and Wireless plc)</p>	Bermuda	Yes
<p>Cable and Wireless (West Indies) Limited (Cable and Wireless plc ultimately owns 100%)</p>	British Virgin Islands	Yes
<p>Radio Telecommunications Company Limited (Cable and Wireless plc owns 49%)</p>	Bulgaria	Yes
<p>Cable & Wireless Canada Inc. (Cable and Wireless plc ultimately owns 100%)</p>	Canada	Yes
<p>Cable & Wireless (Cayman Islands) Limited (C&W (CALA) Investments owns 100%, which is 100% owned by C&W (WI) Ltd, which is ultimately 100% owned by Cable and Wireless plc)</p>	Cayman Islands	Yes
<p>Shenda Telephone Company Limited (Cable and Wireless plc owns 49%)</p>	China	Yes
Branch of Cable and Wireless plc	Diego Garcia	Yes
<p>Cable & Wireless Dominica Limited (Cable and Wireless plc ultimately owns 80%)</p>	Dominica	Yes
Branch of Cable and Wireless plc	Falkland Islands	Yes

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
Fiji International Telecommunications Limited (Cable and Wireless plc owns 49%)	Fiji	Yes
Cable and Wireless S.A. (Cable and Wireless plc ultimately owns 100%)	France	Yes
Cable & Wireless Telecommunication Services GmbH (Cable and Wireless plc ultimately owns 100%)	Germany	Yes
Cable & Wireless Grenada Limited (C&W (WI) Ltd owns 70%, which is ultimately 100% owned by Cable and Wireless plc)	Grenada	Yes
Cable & Wireless M&G SAS (Cable and Wireless plc ultimately owns 100%)	Guadeloupe	Yes
Cable and Wireless Guernsey Ltd (Cable and Wireless plc ultimately owns 100%)	Guernsey	Yes
Cable & Wireless Global Network (Hong Kong) Limited (Cable and Wireless plc ultimately owns 100%)	Hong Kong	Yes
Cable & Wireless Services (Ireland) Limited (Cable and Wireless plc ultimately owns 100%)	Ireland	Yes
Cable & Wireless Isle of Man Limited (Cable and Wireless plc ultimately owns 100%)	Isle of Man	Yes

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
Cable & Wireless S.p.A. (Cable and Wireless plc ultimately owns 100%)	Italy	Yes
Cable & Wireless Jamaica Limited (Cable and Wireless plc ultimately owns 82%) Jamaica Digiport International Limited (provides international service to the Free Trade Zone operators in the Mo Bay Free Zone) (Cable & Wireless Jamaica Limited owns 100% which is 82% owned by Cable and Wireless plc)	Jamaica	Yes
Cable & Wireless IDC Inc. (Cable and Wireless plc owns 97.69%)	Japan	Yes
Cable and Wireless Jersey Limited (Cable and Wireless plc ultimately owns 100%)	Jersey	Yes
Cable & Wireless Luxembourg SA (Cable and Wireless plc ultimately owns 100%)	Luxembourg	Yes
Companhia de Telecomunicacoes de Macau, S.A.R.L. (Cable and Wireless plc owns 51%)	Macau	Yes
Dhivehi Raajjeyge Gulhun Private Limited (Dhiraagu) (Cable and Wireless plc owns 45%)	Maldives	Yes
Cable & Wireless M&G SAS (Cable and Wireless plc ultimately owns 100%)	Martinique	Yes

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
Cable and Wireless (West Indies) Limited (Cable and Wireless plc ultimately owns 100%)	Montserrat	Yes
Cable & Wireless Netherlands B.V. (Cable and Wireless plc ultimately owns 100%)	The Netherlands	Yes
Cable & Wireless Panama S.A. (Cable and Wireless plc ultimately owns 49%)	Panama	Yes
Sakhalin Telecom Limited (Cable and Wireless plc owns 60%) Sakhalin Telecom Mobile (Cable and Wireless (Investments) owns 61.4%, which is 100% owned by Cable and Wireless plc)	Russia	No
Branch of Cable and Wireless plc	St. Helena	Yes
Cable & Wireless St. Kitts & Nevis Limited (C&W (WI) Ltd owns 65%, which is ultimately 100% owned by Cable and Wireless plc)	St. Kitts and Nevis	Yes
Cable and Wireless (West Indies) Limited (Branch of C&W (WI) Ltd, which is ultimately 100% owned by Cable and Wireless plc) Cable and Wireless Caribbean Cellular (St. Lucia) Limited (C&W (WI) Ltd owns 100%, which is ultimately 100% owned by Cable and Wireless plc)	St. Lucia	Yes

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
<p>Cable and Wireless (West Indies) Limited (Cable and Wireless plc ultimately owns 100%)</p> <p>Cable and Wireless Caribbean Cellular (St. Vincent and the Grenadines) Limited (C&W (WI) owns 100%, which is ultimately 100% owned by Cable and Wireless plc)</p>	St. Vincent and The Grenadines	Yes
<p>Cable & Wireless (Seychelles) Limited (Cable and Wireless plc owns 100%)</p>	Seychelles	No
<p>Cable & Wireless Global Pte Ltd (Cable and Wireless plc ultimately owns 100%)</p> <p>MobileOne Limited (Cable and Wireless plc holds a 12.14% stake through Great Eastern Telecommunications Limited, a joint venture with PCCW (51%/49%))</p>	Singapore	Yes
<p>Solomon Telekom Company Limited (Cable and Wireless plc owns 41.9%)</p>	Solomon Islands	Yes
<p>Cable and Wireless S.L. (Cable and Wireless plc ultimately owns 100%)</p>	Spain	Yes
<p>Cable & Wireless Switzerland AG (Cable and Wireless plc ultimately owns 100%)</p>	Switzerland	Yes

Name of the affiliated foreign carrier	Country in which licensed to offer telecommunications services to the public	WTO Members
Telecommunications Services of Trinidad and Tobago Limited (Cable and Wireless plc ultimately owns 49%)	Trinidad and Tobago	Yes
Cable and Wireless (West Indies) Limited (Cable and Wireless plc ultimately owns 100%)	Turks and Caicos	Yes
Cable & Wireless UK (Cable and Wireless plc ultimately owns 100%)	United Kingdom	Yes
Telecom Vanuatu Limited (Cable and Wireless plc owns 33.3%)	Vanuatu	No

Exhibit B - Dominant Status

Destination Market

Anguilla
Antigua and Barbuda
Ascension Island
Bermuda
British Virgin Islands
Cayman Islands
Diego Garcia
Dominica
Falkland Islands
Fiji

Grenada
Guernsey
Jamaica
Macau

Montserrat
Panama
Sakhalin
St. Helena
St. Kitts and Nevis
St. Lucia
St. Vincent and the Grenadines
Seychelles
Turks and Caicos

Name of Affiliated Carrier

Cable and Wireless (West Indies) Limited
Cable and Wireless (West Indies) Limited
Cable and Wireless plc Branch
Cable & Wireless Bermuda
Cable and Wireless (West Indies) Limited
Cable & Wireless (Cayman Islands) Limited
Cable and Wireless plc Branch
Cable & Wireless Dominica Limited
Cable and Wireless plc Branch
Fiji International Telecommunications
Limited
Cable & Wireless Grenada Limited
Cable and Wireless Guernsey Ltd
Cable & Wireless Jamaica
Companhia de Telecomunicacoes de Macau
S.A.R.L.
Cable and Wireless (West Indies) Limited
Cable & Wireless Panama S.A.
Sakhalin Telecom Limited
Cable and Wireless plc Branch
Cable & Wireless St. Kitts & Nevis Limited
Cable and Wireless (West Indies) Limited
Cable and Wireless (West Indies) Limited
Cable & Wireless (Seychelles) Ltd.
Cable and Wireless (West Indies) Limited